

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE)	
CAPITAL ONE TELEPHONE)	Master Docket No. 1:12-cv-10064
CONSUMER PROTECTION ACT)	MDL No. 2416
LITIGATION)	
)	
<hr/>		
This document relates to:)	
)	
BRIDGETT AMADECK, et al.,)	Case No: 1:12-cv-10135
)	
v.)	
)	
CAPITAL ONE FINANCIAL)	
CORPORATION, and CAPITAL ONE)	
<u>BANK (USA), N.A.</u>)	
<hr/>		
This document relates to:)	
)	
NICHOLAS MARTIN, et al.,)	Case No: 1:11-cv-05886
)	
v.)	
)	
LEADING EDGE RECOVERY)	
SOLUTIONS, LLC, and CAPITAL ONE)	
<u>BANK (USA), N.A.</u>)	
<hr/>		
This document relates to:)	
)	
CHARLES C. PATTERSON,)	Case No: 1:12-cv-01061
)	
v.)	
)	
CAPITAL MANAGEMENT)	
SERVICES, L.P. and CAPITAL ONE)	
<u>BANK (USA), N.A.</u>)	
<hr/>		

**CLASS COUNSEL'S MOTION FOR ATTORNEYS' FEES
AND FOR SERVICE AWARDS TO THE CLASS REPRESENTATIVES**

Counsel for Plaintiffs and the Settlement Class ("Class counsel") respectfully request that the Court award Class counsel attorneys' fees of 30% of the Settlement Fund. Class counsel further request that the Court approve incentive awards of \$5,000 each to the five named

plaintiffs, for their service as class representatives in this matter. In support of this motion, Class counsel state:

1. This is a Telephone Consumer Protection Act, 47 U.S.C. §227(b), class action lawsuit, which challenges the use of automatic dialers and prerecorded messages to call cellular telephones. The parties entered into a class Settlement, which the Court preliminarily approved on July 29, 2014. [Docket Entry 137]. This motion is submitted in anticipation of the final approval hearing set for December 9, 2014.

2. Class counsel respectfully request that the Court award Class counsel attorneys' fees of 30% of the Settlement fund. Class counsel further request that the Court approve incentive awards of \$5,000 each to Mr. Patterson, Mr. Mack, Ms. Alarcon, Ms. Amadeck, and Mr. Kalik, for their service as class representatives in this matter.

3. Class counsel submit a memorandum in further support of this motion.

WHEREFORE, Class counsel respectfully request that the Court award Class counsel attorneys' fees of 30% of the Settlement fund. Class counsel further request that the Court approve incentive awards of \$5,000 each Mr. Patterson, Mr. Mack, Ms. Alarcon, Ms. Amadeck, and Mr. Kalik, for their service as class representatives in this matter.

Dated: September 29, 2014

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Jonathan D. Selbin
Jonathan D. Selbin

Jonathan D. Selbin
Email: jselbin@lchb.com
Douglas I. Cuthbertson
Email: dcuthbertson@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: (212) 355-9500
Facsimile: (212) 355-9592

Daniel M. Hutchinson
Email: dhutchinson@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Interim Co-Lead Counsel

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell
Beth E. Terrell

Beth E. Terrell
Email: bterrell@tmdwlaw.com
Michael D. Daudt
Email: mdaudt@tmdwlaw.com
TERRELL MARSHALL DAUDT & WILLIE PLLC
936 North 34th Street, Suite 400
Seattle, Washington 98103
Telephone: (206) 816-6603
Facsimile: (206) 350-3528

Interim Co-Lead Counsel

KEOGH LAW, LTD

By: /s/ *Keith James Keogh*
Keith James Keogh

Keith James Keogh
Email: Keith@Keoghlaw.com
Craig M. Shapiro
Email: cshapiro@keoghlaw.com
Timothy J. Sostrin
Email: tsostrin@keoghlaw.com
KEOGH LAW, LTD
55 W. Monroe
Suite 3390
Chicago, IL 60603

Telephone: (312) 726-1092
Facsimile (312) 726-1093

Interim Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2014, service of this document was accomplished via email and United States First Class Mail to the following:

Aaron D. Van Oort
Email: aaron.vanoort@faegrebd.com
Eileen M. Hunter
Email: eileen.hunter@faegrebd.com
Erin L. Hoffman
Email: erin.hoffman@faegrebd.com
FAEGRE BAKER DANIELS
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402-3901
Telephone: (612) 766-7000
Facsimile: (612) 766-1600

Attorneys for Defendant Capital One

James K. Shultz
Email: jschultz@sessions-law.biz
SESSIONS, FISHMAN, NATHAN & ISRAEL LLC
55 West Monroe Street, Suite 1120
Chicago, Illinois 60603-5130
Direct: (312) 578 -0993
Office: (312) 578-0990
Fax: (312) 578-0991

Attorneys for Defendant Capital Management Systems, LP

Alan I. Greene
agreene@hinshawlaw.com
HINSHAW & CULBERTSON LLP
222 North LaSalle Street, Suite 300
Chicago, IL 60601
Telephone: (312) 704-3536

Attorneys for Defendant Leading Edge Recovery Solutions, LLC

Grace Carter
gracecarter@paulhastings.com
PAUL HASTINGS
55 Second Street
Twenty-Fourth Floor
San Francisco, CA 94105
Phone: (415) 856-7015
Fax: (415) 856-7115

Attorneys for Defendant AllianceOne Receivables Management, Inc.

Dated this 29th day of September, 2014.

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Daniel M. Hutchinson
Daniel M. Hutchinson

Daniel M. Hutchinson
Email: dhutchinson@lchb.com
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Attorneys for Plaintiffs